



DEVELOPMENTS OF REGIONAL IMPACT

Final Report

Northeast Georgia Regional Commission • 305 Research Drive, Athens, Georgia • www.negr.org

The Northeast Georgia Regional Commission (NEGRC) has completed its review of the following Development of Regional Impact (DRI). This report contains the NEGRC’s assessment of how the proposed project relates to the policies, programs, and projects articulated in the Regional Plan and Regional Resource Plan. Also included is an assessment of likely interjurisdictional impacts resulting from the proposed development, as well as all comments received from identified affected parties and others during the fifteen-day comment period.

The materials presented in this report are purely advisory and under no circumstances should be considered as binding or infringing upon the host jurisdiction’s right to determine for itself the appropriateness of development within its boundaries.

Transmittal of this DRI report officially completes the DRI process. The submitting local government may proceed with whatever final official actions it deems appropriate regarding the proposed project, but it is encouraged to take the materials presented in the DRI report into consideration when rendering its decision.

Project I.D.:	DRI #3512
Name of Project:	Pirkle Farms
Name of Host Jurisdiction:	City of Hoschton

Background

DRI review was initiated following the developer’s request for annexation into the City of Hoschton. The developer is also requesting that the City rezone the property from A-2 (Agricultural Rural Farm) to M-1 (Light Industrial) and PUD (Planned Unit Development). Potentially affected parties were asked to submit comments on the proposal during the 15-day period of 11/17/21 – 12/02/21.

Proposed Development

Inline Communities is proposing construction of a mixed-use project consisting of one million square feet of industrial warehouse space, 363 single-family houses, and 175 townhomes on a 400-acre site. Additionally, six stormwater retention ponds, an amenity area, two ballfields with a cart path, a walking trail, 828 automobile parking spaces, and 414 tractor trailer parking spaces would be constructed. The site is currently in unincorporated Jackson County and proposed for annexation into the City of Hoschton. The site address is 1225 Josh Pirkle Road and the parcel numbers are 120 001, 120 001A, 120 001B, 120 001D, and 120 003. It consists of open farmland with some wooded areas. The existing house and its associated outbuildings would be demolished, and the project is slated for completion in December 2024.

Compatibility with Existing Plans

The site is identified as Residential and Parks/Recreation/Conservation on the Jackson County Comprehensive Plan’s Future Land Use Map (dated 12/07/20). It is not included in the City of Hoschton’s Comprehensive Plan because the property is not currently within the city limits.

The Jackson County Comprehensive Plan generally recommends development that makes efficient use of existing infrastructure, avoids sprawl, balances residential and non-residential development, is “compatible” with adjacent parcels, avoids cul-de-sacs, and doesn’t place excessive demand on existing public services and infrastructure—among other policies. Specifically, the Plan’s recommendations for Residential land uses include protecting residential areas from incompatible land uses (such as those that may create excessive noise, odor, light, or traffic), providing natural recreation areas, allowing higher densities in the Urban Character Area, and encouraging inter-connectivity between neighborhoods. For reference, the Plan’s industrial land use policies include recommending that industrial development be confined to relatively level topography, possess adequate water and sewer service, have access to arterial streets, avoid creating excessive noise, odor, light, or hazardous conditions, limit impervious surface coverage to less than 60% of the site, generate high levels of employment, and make use of industrial park and campus designs for the site.

The site is also identified, in the same plan, as Urban on the Character Area Map. Development in this Character Area is expected to have water and sewer service, favor employment uses, use the automobile as the primary transportation mode, manage stormwater, and provide connectivity through paved roads with curb, gutter, and sidewalks. Industrial uses are encouraged in this area.

Part of the tract is identified as Conservation, and development of any type is strongly discouraged in this area. Although the Conservation land closest to the Mulberry River would be used as passive parkland with a trail, the industrial buildings would encroach on this Conservation area.

Generally, it appears that the proposal is inconsistent with the Jackson County Comprehensive Plan. The industrial warehouses encroach on the Conservation area and may create noise and truck traffic that would be incompatible with the adjacent residential subdivision. The residential portion of the proposal may place excessive demands on existing public services, is poorly connected to the street network due to its pod layout, and is unlikely to be “dense” enough to pay for an expansion of public services—particularly the required upgrade to Josh Pirkle Road.

The site is identified as “Developing” on the Northeast Georgia Regional Plan’s Regional Land Use Map (dated 6/7/2018). It is also labeled as an Area Requiring Special Attention due to its location within the Rapid Development corridor along I-85. The Regional Plan recommends development that matches the region’s workforce, prices in the lifecycle cost of infrastructure, creates a sense of place, builds a compact development pattern on existing infrastructure, creates diverse and affordable housing, and complements existing and planned transportation options—especially non-automobile transportation modes. The proposal does not meet the recommendations of the NEGRC’s Regional Plan since it does not appear to price in the lifecycle cost of infrastructure, fails to create a sense of place, builds a sprawling development pattern that encroaches on sensitive natural resources, fails to create diverse housing types, and does not provide the option for multiple transportation modes. A more compact development pattern with multiple types of housing, increased transportation options, and a central greenspace in the residential portion would help meet the recommendations.

Potential Interjurisdictional Impacts

The applicant states that the project would affect multiple environmental quality factors identified on the DRI Additional Form, including water supply watersheds, wetlands, floodplains, and other environmentally sensitive resources. Other quality factors, including groundwater recharge areas, protected mountain and river corridors, and historic resources, would remain unaffected. The Mulberry River and its floodplain form the eastern edge of the property. Three streams also cut through the property.

The National Wetland Inventory (NWI) identifies 9.5 acres of wetlands onsite and 250 acres of wetlands within one mile of the site. The Northeast Georgia Regional Plan's Conservation and Development Map (dated 7/19/2018) identifies 9.5 acres of "Conservation" land onsite and 265 acres of "Conservation" land within one mile of the site. Most of this acreage overlaps with the wetland acreage. Approximately 46 acres of Regionally Important Resources are within one mile of the site, as identified in the Northeast Georgia Resource Management Plan for Regionally Important Resources (dated 8/7/2018). No Regionally Important Resource sites are identified within one mile of the proposed site.

An estimated 35% of the site would be covered in impervious surfaces, and six retention ponds are planned to manage stormwater runoff. The site plan proposes 150' impervious surface buffers around all three streams with the exception of four driveway/street crossings. The warehouse buildings encroach on the Conservation portion of the site, and the site work could easily damage the riparian areas unless extensive measures are taken to prevent disturbance. The proposal should be designed to minimize disruption to the existing river, streams, associated wetlands, and floodplains to avoid future erosion, flooding, and degraded water quality onsite and downstream from the site. Low impact design measures, like bioswales, rain gardens, and other green infrastructure should be incorporated into the project design. At minimum, the project should be in accordance with the latest edition of the Georgia Stormwater Management Manual (Blue Book) and meet all relevant EPD requirements.

A traffic study performed by A&R Engineering estimates that the project would produce 453 AM peak hour trips, 583 PM peak hour trips, and 6,595 trips overall. The site would be accessed via six driveways on Josh Pirkle Road. The applicant plans to construct 828 automobile parking spaces and 414 tractor trailer parking spaces. Numerous new turn lanes and deceleration lanes are recommended for the surrounding street network, and Josh Pirkle Road itself would need to be reconstructed to handle truck traffic. The amount of parking may be excessive and increases stormwater runoff in an environmentally sensitive area. The developer should seek to reduce the amount of land devoted to surface parking. The proposal has limited connections to the surrounding street network which will result in automobile-dependency and increased traffic. Additional street and path connections should be considered.

The project would be served by the City of Hoschton's water and sewer systems with an estimated daily demand of 0.23 MGD for each system. The applicant states that this demand for water can be covered by existing capacity, but the wastewater treatment plant would need to be expanded to serve this project. The City is in the midst of expanding the wastewater treatment plant and has plans to further expand the plant, if necessary. A 0.25 mile water and sewer line extension would be required. The need for plant expansion and line extension would add to the challenges of providing water and wastewater treatment laid out in the City of Hoschton's 2020 Comprehensive Plan.

The applicant estimates that the project would be worth \$175 million at build-out in 2024 and generate \$6.3 million in annual local taxes. On a per-acre basis, the project would be worth approximately \$437,500 and generate approximately \$15,750 in tax revenue. Prior to approval, the City should measure the life cycle costs of the infrastructure needed to serve this project to ensure that they would not be committing to more maintenance expenses than the new tax revenue can cover.

Comments from Affected Parties

Alan Hood, Airport Safety Data Program Manager, Georgia Department of Transportation

The proposed mixed-use development, consisting of one million square feet of industrial warehouse space, 363 single-family houses, and 175 townhomes on a 400-acre site in unincorporated Jackson County and proposed for annexation into the City of Hoschton, is 9.6 miles from the nearest public use airport. It is outside the FAA approach and departure surfaces, and is outside airport compatible land use areas, and does not appear to impact any airport.

If any construction equipment or construction exceeds 200' above ground level, an FAA Form 7460-1 must be submitted to the Federal Aviation Administration. Those submissions for any associated buildings or cranes taller than 200' may be done online at <https://oeaaa.faa.gov>. The FAA must be in receipt of the notifications, no later than 120 days prior to construction. The FAA will evaluate the potential impacts of the project on protected airspace associated with the airports and advise the proponent if any action is necessary.

Thank you for the opportunity to comment on the proposed development.